

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOANNE JAFFE,

v.

CITY OF NEW YORK, MAYOR BILL DE
BLASIO, and POLICE COMMISSIONER
JAMES O'NEILL

Docket No. 19-cv-07024 (LAP)

CIVIL CASE MANAGEMENT AND
SCHEDULING ORDER

LORETTA A. PRESKA, United States District Judge:

This Civil Case Management Plan is submitted by the parties in accordance with Fed. R. Civ. P. 26(f)(3).

1. All parties **do not consent** to disposition of this case by a Magistrate Judge, pursuant to 28 U.S.C. § 636(c).
2. The parties expect that this case **is** to be tried by a jury.
3. Amended pleadings may not be filed and additional parties may not be joined after **February 14, 2020** except with leave of the Court.
4. Initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) shall be completed no later than **April 1, 2023**.
5. All fact discovery shall be completed no later than **August 25, 2023**.
6. The plaintiff shall provide HIPAA-compliant medical release forms by **October 1, 2020**.

7. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the parties on consent without application to the Court, provided that the parties meet the deadline for completing fact discovery set forth in ¶ 5 above.

- a. Initial requests for production of documents pursuant to Fed. R. Civ. P. 34 shall be served by **June 20, 2022**.
- b. Interrogatories shall be served by **June 20, 2022**.
- c. Document productions shall be completed no later than **April 14, 2023**.
- d. Depositions shall be completed by **July 14, 2023**.
- e. Requests to admit pursuant shall be served by **July 28, 2023**.

8. Expert Discovery

- a. The parties do not expect that there will be expert testimony.

9. Motions for summary judgment, if any, shall be filed no later than **September 22, 2023**. Responses, if any, shall be filed no later than **October 20, 2023**, with replies due **November 3, 2023**.

10. Counsel for the parties have conferred and their present best estimate of the length of trial is **5 days**.

Counsel for the parties:

LEWIS BAACH KAUFMANN
MIDDLEMISS PLLC

By: /s/ John W. Moscow
John W. Moscow

LA PIETRA & KRIEGER, P.C.

By: /s/ Louis C. La Pietra
Louis C. La Pietra

Counsel for Plaintiff

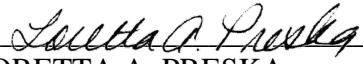
HON. SYLVIA O. HINDS-RADIIX
Corporation Counsel of the City of New York

By: /s/ Lawrence J. Profeta
Lawrence J. Profeta, Assistant
Corporation Counsel

Counsel for Defendants

SO ORDERED.

Dated: 2/17/2023
New York, New York


LORETTA A. PRESKA
United States District Judge